

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA;)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:24-cv-02101
)	
THE STATE OF TENNESSEE and the)	Chief Judge Lipman
TENNESSEE BUREAU OF)	
INVESTIGATION;)	Magistrate Judge Pham
)	
Defendants.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants the State of Tennessee and the Tennessee Bureau of Investigation hereby move under Fed. R. Civ. P. 6(b) for a 28-day extension of time in which to respond to the complaint. The current deadline to respond is March 13, 2024. Defendants request up to and including April 10, 2024, to respond to the complaint.

An extension will allow the Parties time to discuss the allegations, as well as time to permit counsel for Defendants to adequately respond to the breadth and scope of these allegations. Counsel for Defendants have consulted with counsel for Plaintiff regarding this issue, as well as the requested extension up to and including April 10, 2024. Counsel for Defendants has consulted with counsel for Plaintiff regarding the requested extension. Counsel for Plaintiff does not oppose this motion, and the parties agree that the extension is appropriate and in the best interests of the case.

Respectfully submitted,

JONATHAN SKRMETTI
Attorney General and Reporter

/s/ John R. Glover
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 29th day of February 2024, upon:

Kristen Clarke
Assistant Attorney General
Civil Rights Division

Stephanie M. Berger
Trial Attorney
Disability Rights Division

U.S. Department of Justice
150 M Street NE
Washington, D.C. 20002

s/ John R. Glover
JOHN R. GLOVER